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18 Attorneys for Defendants, CLARK R. TAYLOR, AICP, THE LOS ANGELES  
19 COUNTY DEPARTMENT OF REGIONAL PLANNING

20 **UNITED STATES DISTRICT COURT**

21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

22 CLINTON BROWN,  
23 Plaintiff,  
24 v.  
25 CLARK R. TAYLOR, AICP, THE  
26 LOS ANGELES COUNTY  
27 DEPARTMENT OF REGIONAL  
28 PLANNING,  
Defendants.

Case No. 2:22-cv-09203-MEMF-KS

**DECLARATION OF SANAZ  
RASHIDI ISO DEFENDANTS'  
OPPOSITION TO PLAINTIFF'S  
MOTION FOR LEAVE TO AMEND  
COMPLAINT**

Assigned to:  
Hon. Maame Ewusi-Mensah Frimpong  
Courtroom "8B"

Magistrate Judge Karen L. Stevenson  
Courtroom "580"

I, Sanaz Rashidi, declare as follows:

1. I am an attorney duly licensed to practice before this Court and am an  
associate with Hurrell Cantrall LLP, attorneys of record for Defendant Clark R.  
Taylor. AICP. The Los Angeles County Department of Regional Planning herein.

1 The facts set forth herein are of my own personal knowledge and if sworn I could  
2 and would testify competently thereto.

3 2. Mr. Brown did not comply with the District's Local Rule 7-3, which  
4 states a party must "first contact opposing counsel to discuss thoroughly, preferably  
5 in person, the substance of the contemplated motion and any potential resolution" at  
6 least seven days before filing a motion. Mr. Brown undisputedly did not comply  
7 with this requirement, and in fact, never informed Defendants of his intention to file  
8 his motion.

9 I declare under penalty of perjury under the laws of the State of California  
10 that the foregoing is true and correct.

11 Executed on March 6, 2025, at Los Angeles, California.

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13 */s/ Sanaz Rashidi*  
14 Sanaz Rashidi  
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